

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**SCOTT TURNAGE, CORTEZ D.  
BROWN, DEONATAE TATE, JEREMY  
S. MELTON, ISSACCA POWELL,  
KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN and KIMBERLY  
ALLEN on behalf of themselves and all  
similarly situated persons,**

**Plaintiffs,**

**vs.**

**BILL OLDHAM, in his individual capacity  
as former Sheriff of Shelby County,  
Tennessee; et al.**

**Defendants.**

**Case No. 2:16-cv-2907-SHM/tmp**

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE CIVIL  
RIGHTS ACT OF 1871, 42 U.S.C. §  
1983, TENNESSEE COMMON LAW,  
DECLARATORY, AND  
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R. CIV.  
PRO. 38(a) & (b)**

**DEFENDANT TETRUS CORP.'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO  
PLAINTIFFS' SEVENTH AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendant Tetrus Corp. ("Tetrus") moves the Court to extend to August 6, 2019 its time to answer or otherwise respond to Plaintiffs' Seventh Amended Complaint (ECF No. 218).

In support of this request, Tetrus respectfully submits as follows:

1. The Seventh Amended Complaint was filed by Plaintiffs on June 19, 2019.
2. Tetrus was served with process on June 25, 2019 so that, pursuant to Fed. R. Civ. P. 12, its deadline to respond is July 16, 2019.
3. Tetrus requests a 21-day extension of this deadline due to the fact that it has just retained counsel and needs time to familiarize itself with the facts and

claims at issue in order to properly answer or otherwise respond to Plaintiffs' Seventh Amended Complaint.

4. This brief extension will not prejudice the other parties.
5. Pursuant to the Local Rules of this Court, counsel for Tetrus has consulted with Frank L. Watson, III, one of the attorneys for Plaintiffs, and has been advised that Plaintiffs do not oppose the relief requested.

Accordingly, Tetrus respectfully requests that its Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiffs' Seventh Amended Complaint be granted, and that its deadline for filing an answer or otherwise responding to the Seventh Amended Complaint be extended to August 6, 2019.

A proposed Order granting the Motion will be emailed to the Court.

Respectfully submitted,

/s/ Thomas Anthony Swafford

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*Attorneys for Defendant Tetrus Corp.*

**CERTIFICATE OF CONSULTATION**

The undersigned counsel for Defendant Tetras Corp. consulted with counsel for Plaintiffs, Frank L. Watson, III concerning the relief requested herein. Mr. Watson advised that Plaintiffs' do not oppose the relief requested in this motion.

/s/ Thomas Anthony Swafford

Thomas Anthony Swafford, TN BPR No. 017578

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to the following:

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/s/ Thomas Anthony Swafford